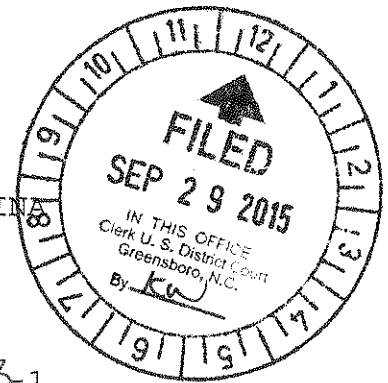


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
 v. : 1:15CR 353-1  
 :  
 JOHN WAYNE VALEU :

The Grand Jury charges:

COUNT ONE

From on or about December 27, 2014, continuing up to and including on or about July 31, 2015, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, JOHN WAYNE VALEU knowingly did receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT TWO

On or about February 2, 2015, in the County of Durham, in the Middle District of North Carolina, JOHN WAYNE VALEU knowingly did distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped and transported in

interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT THREE

On or about July 30, 2015, in the County of Durham, in the Middle District of North Carolina, JOHN WAYNE VALEU knowingly did distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT FOUR

On or about August 19, 2015, in the County of Durham, in the Middle District of North Carolina, JOHN WAYNE VALEU did knowingly possess materials which contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), said child pornography containing an image that involved a prepubescent minor and a minor who had not yet attained 12 years of age, and which materials had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using

materials that had been shipped and transported in and affecting interstate and foreign commerce, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

#### FORFEITURE ALLEGATION

Upon conviction of the offenses alleged above, the defendant, JOHN WAYNE VALEU, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Section 2252A, and all property, real or personal, used or intended to be used to commit or promote the commission of the offense of conviction, including but not limited to the following items that were obtained from defendant on August 19, 2015:

- a. One HP Pavilion 500 Desktop Computer, serial number MXX4190N1F;
- b. WD MyPassport USB External Hard Drive, serial number WX51C10172312;
- c. One Hitachi Internal Hard Drive, serial number GJG1WAYE; and
- d. One HP Pavilion Laptop; serial number 3CF731360V.

All in accordance with Title 18, United States Code,  
Section 2253, and Rule 32.2, Federal Rules of Criminal  
Procedure.

A TRUE BILL:

A handwritten signature in black ink, appearing to read "Eric L. Iverson", written over a horizontal line.

ERIC L. IVERSON  
ASSISTANT UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Ripley Rand", written over a horizontal line.

RIPLEY RAND  
UNITED STATES ATTORNEY